

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re: ) Chapter 11  
 )  
YELLOW CORPORATION, *et al.*<sup>1</sup> ) Case No. 23-11069 (CTG)  
 )  
Debtors. ) (Jointly Administered)  
 )  
 ) Re: \_\_\_\_\_

**[PROPOSED] ORDER GRANTING MOTION OF SEUNG CHUNG AND  
GRANTING RELIEF FROM THE AUTOMATIC STAY**

AND NOW THIS \_\_\_\_\_ day of \_\_\_\_\_ 2023, upon consideration of the *Motion of Seung Chung for Order Granting Relief From The Automatic Stay* (the “Motion”), the Court having determined that good and adequate cause exists for approval of the Motion, and the Court having determined that no further notice of the Motion is necessary,

IT IS ORDERED:

1. That the Motion is GRANTED as set forth herein; and
2. The automatic stay of 11 U.S.C. § 362(a) of the Bankruptcy Code is immediately lifted and an action may be commenced in any state court of competent jurisdiction in the State of Illinois (the “Illinois Court Action”) and shall be permitted to proceed to adjudication; and
3. That Movant shall be entitled to liquidate and satisfy to judgment or other resolution granted, if any, from applicable insurance coverage available to the Debtors; and
4. To the extent that insurance proceeds are unavailable, or insufficient, Movant will return to this Court for disposition of his claim; and

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<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 10990 Roe Avenue, Overland Park, Kansas 66211.

5. Nothing in this order shall prevent the Movant from engaging with Debtors in settlement negotiations and/or an ADR process or other means of resolution to be offered by Debtors or otherwise permitted by the Court; and

6. This Order does not prevent Movant from seeking further relief from the automatic stay in connection with the Illinois Court Action or otherwise; and

7. Relief from the automatic stay shall be effective immediately upon entry of this Order and the 14 day stay provided in Bankruptcy Rule 4001(a)(3) shall not apply; and

8. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation and enforcement of this Order.